IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re TERRORIST ATTACKS ON SEPTEMBER 11, 2001

Case No. 1:03-md-01570-GBD-SN

This document relates to:

The Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., No. 16-cv-7853; Aguilar, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09663; Addesso, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09937; Hodges, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-0117; Aiken, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00450; Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., No. 17-cv-02651; Abarca, et al., v. Kingdom of Saudi Arabia, et al., No. 17-cv-03887; Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03908; and Abedhajajreh v. Kingdom of Saudi Arabia, No. 17-cv-06123.

AL RAJHI BANK'S NOTICE OF MOTION TO DISMISS PLAINTIFFS' AMENDED COMPLAINT FOR FAILURE TO STATE A CLAIM AND LACK OF PERSONAL JURISDICTION

PLEASE TAKE NOTICE that, pursuant to Rules 7(b), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1, Defendant Al Rajhi Bank hereby appears for the purpose of moving the Court, before the Honorable George B. Daniels, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an order dismissing all of the claims asserted against Al Rajhi Bank for failure to state a

claim and for want of personal jurisdiction. A memorandum of law in support of this Motion is filed herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to a scheduling order issued by the Honorable Sarah Netburn (ECF No. 3584), any opposing papers shall be filed electronically no later than October 20, 2017.

Dated: August 21, 2017 Washington, DC Respectfully submitted,

WHITE & CASE

/s/ Christopher M. Curran

Christopher M. Curran

Nicole Erb

Matthew S. Leddicotte (*pro hac vice* admission pending)

Reuben J. Sequeira (*pro hac vice* admission pending)

WHITE & CASE LLP

701 Thirteenth Street, NW

Washington, DC 20005

Telephone: + 1 202 626 3600

Facsimile: + 1 202 639 9355

ccurran@whitecase.com

nerb@whitecase.com

mleddicotte@whitecase.com

rsequeira@whitecae.com

Counsel for Al Rajhi Bank

CERTIFICATE OF SERVICE

I hereby certify that, on August 21, 2017, I caused an electronic copy of the foregoing document to be served electronically by the Court's Electronic Case Filing (ECF) System on the consolidated MDL docket and the individual dockets for the following consolidated cases:

The Underwriting Members of Lloyd's Syndicate 2, et al. v.

Al Rajhi Bank, et al., No. 16-cv-7853

Aguilar, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09663

Addesso, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09937

Hodges, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-0117

Aiken, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00450

Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., No. 17-cv-02651

Abarca, et al., v. Kingdom of Saudi Arabia, et al., No. 17-cv-03887

Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03908

Abedhajajreh, et al., v. Kingdom of Saudi Arabia, et al., No. 17-cv-06123

Dated: August 21, 2017

/s/ Christopher M. Curran

Christopher M. Curran